



HUMMEL CROTON INC.

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DIRECTOR'S OFFICE
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December 4, 1995

Mr. Lance R. Richman, P.G.
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
290 Broadway -- 19th Floor
New York, NY 10007-1866

Dear Mr. Richman,

Enclosed please find the response of Hummel Croton, Inc. to the USEPA's Second Request for Information regarding the Diamond Alkali Superfund Site, Passaic River Study Area, Foundry Street Complex. Please be advised that Hummel Croton previously conducted, and has now again conducted a diligent investigation into the areas for which information is sought, and has responded to both USEPA Requests for Information to the best of its ability.

Should you require information in the future, we request that you contact directly our attorney, Michael Phillips, Esq., of Conte, Phillips & Clayton, 50 Market Street, Saddle Brook, New Jersey 07663 (201 843-7711).

Very truly yours,


Bernard R. Schoen, Sr., President
Hummel Croton, Inc.

cc: Michael Phillips, Esq.

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**RESPONSE OF HUMMEL CROTON, INC.
TO USEPA SECOND REQUEST FOR INFORMATION
REGARDING DIAMOND ALKALI SUPERFUND SITE,
PASSAIC RIVER STUDY AREA
FOUNDRY STREET COMPLEX**

1. As indicated in Hummel Croton's January 25, 1994 response to USEPA's December 16, 1993 Request for Information letter, Hummel Croton, Inc. never operated a facility at the Foundry Street Complex. Upon information and belief, Hummel Chemical Company conducted business for a time in the early 1960s at 185 Foundry Street, Newark, New Jersey. Hummel Croton possesses no records which would indicate the years Hummel Chemical Company operated at Foundry Street.

It is noted in the Background section of EPA's Second Request for Information that

EPA has information indicating that hazardous substances from the Hummel Chemical Company facility located at 185 Foundry Street in Newark, New Jersey may have been discharged into the Passaic River.

Hummel Croton does not possess records or other information which would indicate, one way or the other, that any of these materials were received, used, manufactured, discharged, released or disposed of by Hummel Chemical at Foundry Street. Accordingly, it is requested that EPA provide Hummel Croton with any information it may have regarding the foregoing allegation, so that Hummel Croton may investigate any potential leads that such information may disclose, in furtherance of Hummel Croton's responses to this Information Request.

2. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
3. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
4. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
5. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
6. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
7. See response to 1, above. Hummel Croton does not possess

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records responsive to either part of this question.

8. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
9. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
10. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
11. See response to 1, above. Hummel Croton does not possess records responsive to either part of this question.
12. This and the previous information request pertain to a location which Hummel Croton never owned nor operated, and seek information from a time over twenty-seven years ago. Hummel Croton simply does not possess any records pertaining to this facility or Hummel Chemical's operations there.

Nevertheless, Hummel Croton has conducted another diligent search of its files, all of which are located at its only place of business -- 10 Harmich Road, South Plainfield, New Jersey -- in order to respond to this Second Request for Information. As indicated previously, no current employees of Hummel Croton possess any information responsive to this or the previous First Request for Information.

13. Bernard F. Schoen, Sr.
c/o Hummel Croton, Inc.
10 Harmich Road
South Plainfield, New Jersey
(908) 754-1800

Hummel Croton is also aware that James M. Vreeland, River Road, Far Hills, New Jersey, was president of Hummel Chemical Company during the time Hummel Chemical operated at the Foundry Street location.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Middlesex:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

BERNARD SCHOEN

NAME (print or type)

Bernard F. Schoen

PRESIDENT

TITLE (print or type)

President, Hummel-Croton, Inc.

[Signature]
SIGNATURE

Sworn to before me this 4
day of December, 1995

Urmi Kadia
Notary Public

URMI KADIA

NOTARY PUBLIC OF NEW JERSEY

MY COMMISSION EXPIRES DECEMBER 15, 1997

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